

(3)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

~~SEALED~~ UNSEALED
2/21/17 KJK

Plaintiff,

v.

Criminal Action No. 17-~~14-VNK~~

HO KA TERENCE YUNG,

Defendant.

INDICTMENT

~~REDACTED~~

The Grand Jury for the District of Delaware charges that:

Count One

From on or about April 2015, the exact date being unknown, through on or about October 29, 2016, in the State and District of Delaware and elsewhere, the defendant, HO KA TERENCE YUNG, with the intent to harass and intimidate, and place under surveillance with intent to harass and intimidate another person, specifically Victim 1, used any interactive computer service, electronic communication service, electronic communication system of interstate commerce, and any facility of interstate or foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1, an immediate family member of

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Victim 1, and the spouse and intimate partner of Victim 1, in violation of Title 18, United States Code, Section 2261A(2)(B) and 2261(b).

A TRUE BILL:

Foreperson

CHARLES M. OBERLY, III
UNITED STATES ATTORNEY

By: _____

Shawn A. Weede
Elizabeth L. Van Pelt
Assistant United States Attorneys

Dated: February 16, 2017